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VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: EverSpring Capital Partners, KFT. v. Polyak,
Case No. 1:20-cv-6773 (JGK)

Dear Judge Koeltl:

*November 4 conference
adjourned to 11/18/20 at 3⁰⁰ P.M.
All deadlines stayed to a time to be
decided at the November 18 Conference,
if necessary. So ordered.
J. Koeltl
11/4/20. U.S.D.J.*

This firm represents the plaintiff, EverSpring Capital Partners, KFT. ("EverSpring") in the above-captioned case.

The parties write to jointly respectfully request that the parties' pre-motion conference currently scheduled for today, November 4, 2020 at 3:00 P.M. be continued briefly by approximately 7 to 10 days, as the Court's schedule allows. The parties are currently engaged in settlement discussions and this additional time will allow them to continue to focus attention on that effort. Defendant Levente Polyak ("Mr. Polyak") joins in this request for a continuance of today's pre-motion conference.

In addition, EverSpring also requests an extension of its time to submit its response to Mr. Polyak's counter-claims. Specifically, EverSpring requests an extension of two weeks following the Court's decision on EverSpring's request for leave to file a motion to dismiss, or alternatively summary judgment on, Mr. Polyak's counter-claims.

Pursuant to Rule 1.E of the Court's Individual Practices, EverSpring represents as follows: (1) the current deadline for filing EverSpring's response to Mr. Polyak's counter-claims is November 6, 2020; (2) the original deadline for filing EverSpring's response to Mr. Polyak's counter-claims was October 7, 2020; (3) this is EverSpring's second request for an extension of time with respect to this deadline; (4) EverSpring's previous request for an extension of time was granted; and (5) Mr. Polyak consents to the requested extension. The requested extension does not affect any other scheduled dates. Good cause exists for the requested extension because the parties are currently engaged in settlement discussions and believe focusing their attention on that effort rather than engaging in motion practice or further pleading would be beneficial at this time. Accordingly, EverSpring respectfully requests the Court to grant an extension of time to respond to Mr. Polyak's counterclaims up to and including two weeks following

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the Court's decision on EverSpring's request for leave to file a motion to dismiss, or alternatively summary judgment on, Mr. Polyak's counter-claims.

Thank you for your consideration of the foregoing.

Respectfully submitted,

EverSpring Capital Partners, KFT.

/s/ Taruna Garg

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cc: Levente Polyak, Defendant (via ECF)